

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13  
SHARONN E. THOMAS, :  
Debtor :  
: Bankruptcy No. 18-17430-elf

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Martin Brown and Brown and Thomas, LLC have filed a Motion Under § 1307(c) to Convert this Case to Chapter 7 (or, Alternatively, Dismiss it with a Filing Injunction)

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before January 8, 2019 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court  
The Robert Nix Building  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's attorney:

Clayton Commercial Litigation LLC  
E. McCord Clayton, Esquire  
Two Penn Center  
1500 JFK Boulevard, Suite 920  
Philadelphia, PA 19102  
P: 267-242-3943  
Cord@claytonlit.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on January 22, 2019 at 9:30 a.m., Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 201, Philadelphia, PA, 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office(s) in Philadelphia at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Respectfully Submitted,



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E. McCord Clayton, Esq.  
Clayton Commercial Litigation LLC  
Two Penn Center  
1500 JFK Boulevard, Suite 920  
Philadelphia, PA 19102  
Ph: 267-242-3943  
cord@claytonlit.com

Dated: December 21, 2018

CERTIFICATE OF SERVICE

I hereby certify that on the date referenced below I served the foregoing document on Defendant's counsel, Joshua L. Thomas, Esq., and all other counsel and parties of record, via electronic court filing.



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E. McCord Clayton, Esq.

Dated: December 21, 2018